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9 Attorney for Plaintiff
10 ENTREPRENEUR MEDIA, INC.

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 ENTREPRENEUR MEDIA, INC., a
14 California corporation,
15 Plaintiff,

16 v.

17 ARIADNE CAPITAL LIMITED, a
18 U.K. company and ENTREPRENEUR
19 COUNTRY, an unknown entity,
20 Defendants.

CASE NO. 8:12-CV-02168-CJC-AN
DECLARATION OF RONALD L.
YOUNG

Hearing Date: July 17, 2014
Time: Not Set
Judge: Hon. Arthur Nakazato

REDACTED PUBLIC VERSION

1 I, Ronald L. Young declare as follows:

2 1. I am the General Counsel for Plaintiff Entrepreneur Media, Inc.
3 ("Plaintiff" or "EMI"). I have been EMI's General Counsel for nearly 27 years and
4 am familiar with EMI's files relating to legal matters. I have personal knowledge
5 of the matters set forth herein, and if called upon as a witness could competently
6 testify thereto.

7 2. I have reviewed the Requests for Production served by Ariadne Capital
8 Limited in the above-captioned matter.

9 3. For Request 1, I, or someone under my direction, searched EMI's files
10 for any documents concerning Ariadne, EntrepreneurCountry, or the
11 EntrepreneurCountry Mark. Any documents that were located were provided to
12 Jones Day, EMI's outside counsel. It is my understanding that all non-privileged
13 documents responsive to this request have been produced.
14

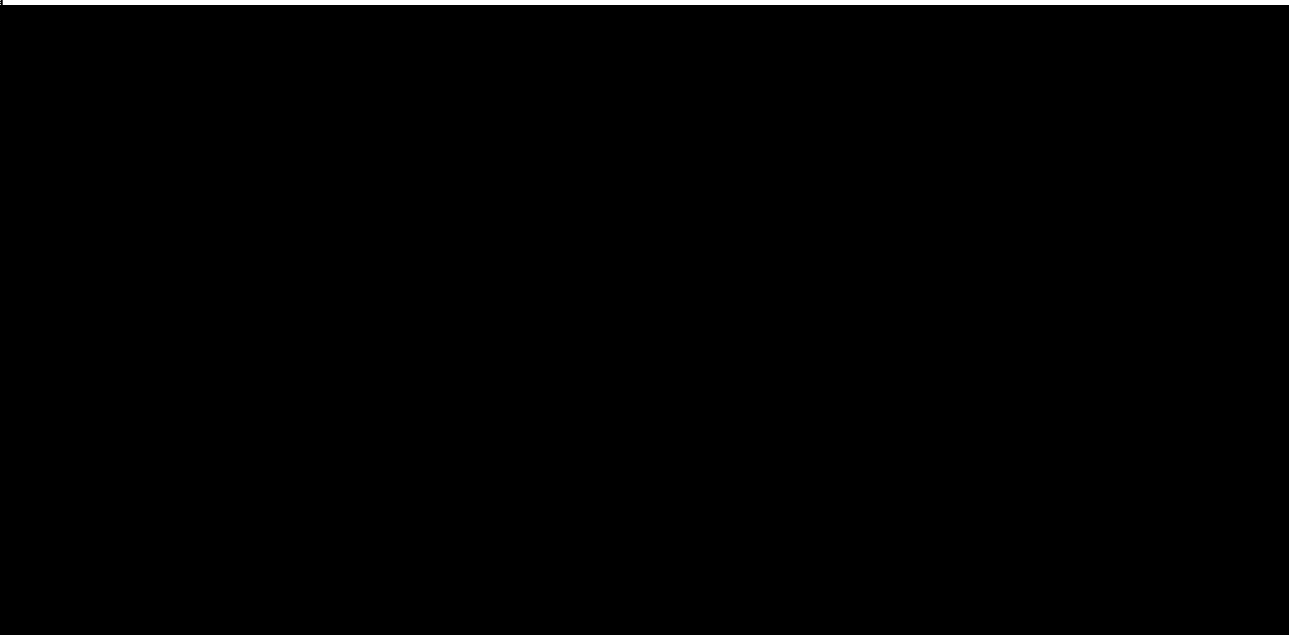
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18 5. For Request 5, I provided to Jones Day a copy of a then-current issue
19 of *Entrepreneur* magazine. I have confirmed that back issues of *Entrepreneur*
20 magazine are available for purchase by the public on EMI's website,
21 www.entrepreneur.com.

22 6. For Request 13, I, or someone under my direction, searched EMI's
23 files for any documents reflecting confusion between EMI's goods and services and
24 Ariadne's goods and services. To date I have not located any documents which
25 reflect actual confusion between EMI's goods and services and Ariadne's goods
26 and services.

27 7. For Request 15, I provided Jones Day with financial data showing
28

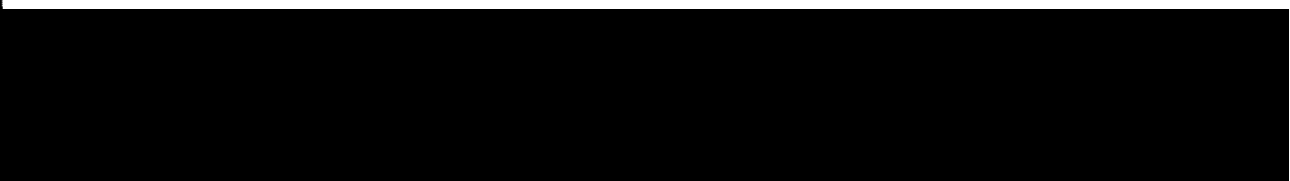
1 EMI's revenues dating back to 2009.

2 8. For Requests 16-19, I provided any documents identified in EMI's
3 Rule 26(a)(1) disclosures, or relied upon to respond to Ariadne's Interrogatories or
4 Requests for Admission to Jones Day, and it is my understanding that such
5 documents have been produced.
6

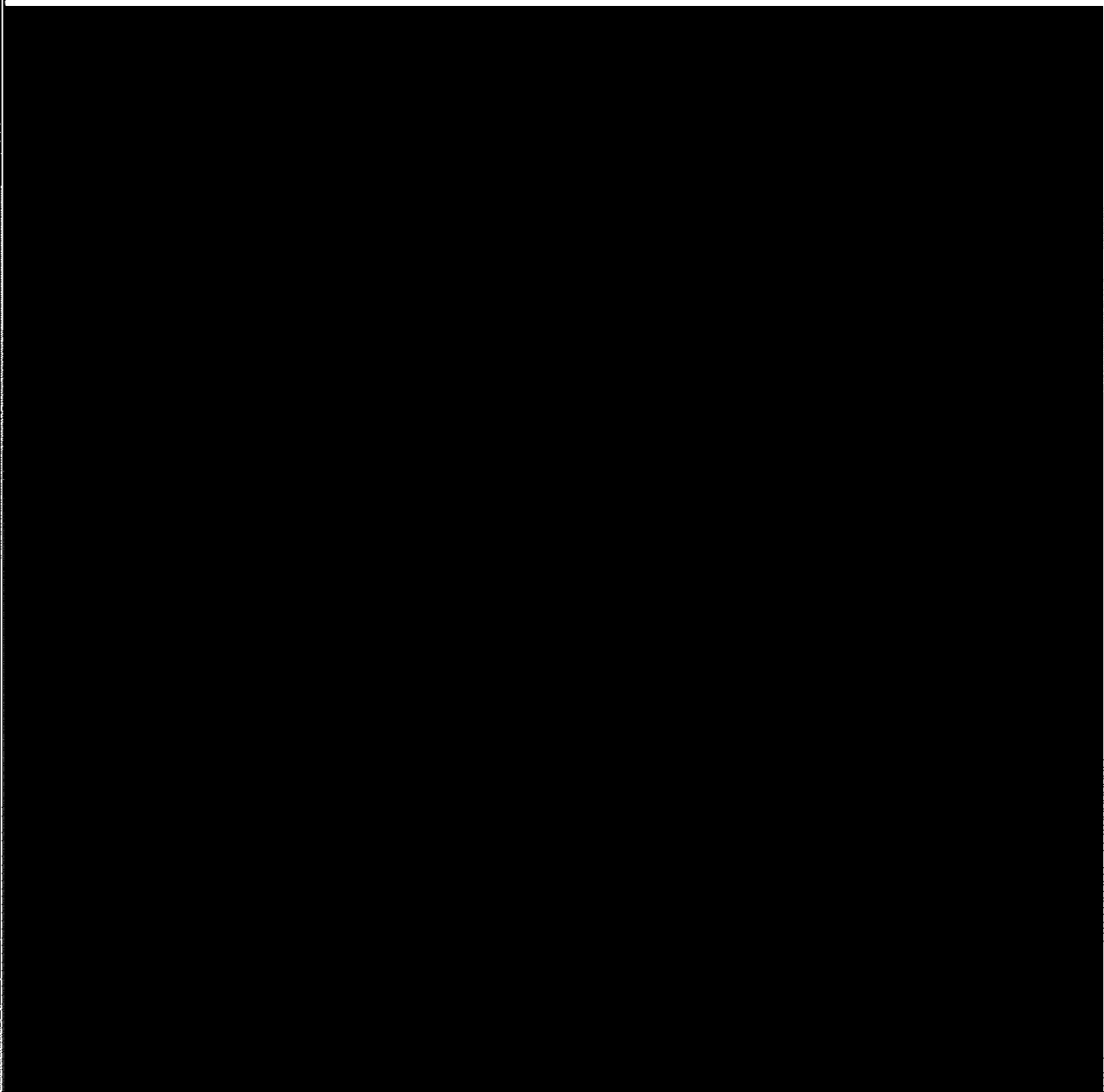


10 10. For Request 34 regarding EMI's document retention policies, EMI has
11 document retention policies in place to comply with local, state and federal laws
12 and regulations. These policies relate to documents such as tax records, personnel
13 files, and other regulated categories of documents.
14

15 11. For Interrogatory 5, I, or someone under my direction, searched EMI's
16 files for non-privileged documents related to Ariadne, EntrepreneurCountry, or the
17 EntrepreneurCountry Mark, including communications. To my knowledge to date,
18 there are no non-privileged communications with third parties regarding Ariadne,
19 EntrepreneurCountry, or the EntrepreneurCountry Mark in EMI's custody or
20 control.
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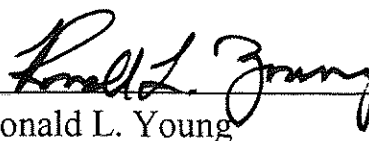


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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 26th day of June, 2014 in Irvine, California.

/s/ 
Ronald L. Young